UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION.

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO FILE
OPPOSITION TO PLAINTIFFS' MOTION
FOR LEAVE TO FILE SECOND
AMENDED CONSOLIDATED
COMPLAINT

Pursuant to Local Rule 6-2(a), the parties stipulate and agree as follows:

1. On April 14, 2020, Plaintiffs filed a motion for leave to file a Second Amended Consolidated Complaint.

2. Defendant Facebook, Inc.'s opposition to that motion is currently due April 28, 2020, pursuant to Local Rule 7-3(a).

3. Facebook requires additional time to prepare its opposition, particularly in view of Magistrate Judge Corley's April 17, 2020 Order directing the parties to focus their resources this month on four specific discovery issues.

4. On April 22, 2020, counsel for Facebook contacted Co-Lead Counsel for Plaintiffs to ask for consent to an extension of time to respond to Plaintiffs' motion.

5. The parties have agreed to a fourteen-day extension of the deadline to file an opposition to Plaintiffs' motion for leave to file a Second Amended Consolidated Complaint.

The parties accordingly stipulate that Facebook's opposition shall be filed on or before May 12, 2020.

6. The parties stipulate that Plaintiffs' reply in support of the motion for leave to file a Second Amended Consolidated Complaint is due May 19, 2020.

7. The parties stipulate to continue the hearing on the motion, which Plaintiffs noticed for May 21, 2020 at 10 a.m., to June 4, 2020 at 10 a.m., or such other date that is convenient for the Court.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: Apri	1 27, 2020
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By: <u>/s Derek W. Loeser</u> Derek W. Loeser

Derek Loeser (pro hac vice) Lynn Lincoln Sarko (pro hac vice) Gretchen Freeman Cappio (pro hac vice) Respectfully submitted,

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Co-Lead Counsel for Plaintiffs

DATED: April 27, 2020

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATE: ______ United States District Judge Vince Chhabria

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained.

DATED: April 27, 2020 By: /s/ Orin Snyder

Orin Snyder

CERTIFICATE OF SERVICE

I, Orin Snyder, hereby certify that on April 27, 2020, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

By: <u>/s/ Orin Snyder</u> Orin Snyder